

Exhibit 2

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June 19, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: In re: General Motors LLC Ignition Switch Litigation,
14-MD-2543 (JMF)**

Dear Judge Furman:

Pursuant to this Court's Order No. 8 § V, Lead and Liaison Counsel and counsel for General Motors LLC ("New GM") submit this joint written update to advise the Court of matters of possible significance in proceedings related to MDL 2543.

First, the Honorable Melodie Clayton has entered three orders in *Pate, et al. v. General Motors LLC, et al.*, No. 14A-2712-1 (Cobb County, Ga.), following the May 28, 2015 hearing on the parties' competing motions for leave to serve discovery, which was the subject of the parties' June 5, 2015 joint letter to the Court. (*See* Doc. No. 1015.) On May 29, 2015, Judge Clayton denied plaintiffs' motion for leave to serve discovery that was not case-specific and was more easily obtained under the parties' Joint Coordination Order. On June 4, 2015, Judge Clayton entered an order granting in part plaintiffs' motion for leave to serve discovery—to which New GM had already consented—and granting New GM's separate motions for leave to serve party discovery. On June 12, 2015, Judge Clayton entered an order granting New GM's motion for leave to serve non-party discovery. Copies of the three orders are attached hereto as Exhibits 1–3, respectively.

Second, on June 11, 2015, the Honorable Thomas A. Bedell held a scheduling conference and set trial for September 19, 2016 in *Clark (William), et al. v. General Motors LLC, et al.*, No. 15-C-134-2, (Harrison County, W.Va.), a personal injury action alleging ignition switch defects in a 2010 Chevrolet Impala. A copy of the scheduling order is attached hereto as Exhibit 4. New GM has presented the MDL 2543 Coordination Order to plaintiff's counsel and anticipates their consent.

Third, on June 12, 2015, the Honorable Thomas Ludington granted New GM's motion to stay the action in *Pillars v. General Motors LLC*, No. 1:15-cv-11360 (E.D. Mich.), a Pre-Sale

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wrongful death action alleging airbag defects in a 2004 Pontiac Grand Am, pending a transfer determination by the Judicial Panel on Multidistrict Litigation (“JPML”). A copy of the stay order is attached hereto as Exhibit 4. The JPML will consider the transfer without oral argument at a hearing on **July 30, 2015**.

Fourth, on June 17, 2015, the parties completed supplemental briefing on New GM’s motion for entry of the MDL 2543 Coordination Order in *Mathes v. General Motors LLC*, No. CL12001623-00 (Augusta County, Va.), which was the subject of the parties’ May 22 and June 5, 2015 joint letters to the Court. (*See* Doc. Nos. 978, 1015.) Copies of plaintiffs’ supplemental response and New GM’s reply are attached hereto as Exhibits 5–6, respectively.

Fifth, on June 8, 2015, plaintiffs in *Felix, et al. v. General Motors LLC*, No. 1422-CC09472 (City of St. Louis, Mo.), filed a notice for a hearing on plaintiffs’ motion for sanctions against New GM, which was the subject of the parties’ May 22, 2015 joint letter to the Court. (*See* Doc. No. 978.) A copy of the notice is attached hereto as Exhibit 7. The Honorable David Dowd will hear argument on the motion on **June 30, 2015**. The *Felix* plaintiffs continue to receive access to the MDL Document Depository and opportunities to participate in MDL depositions. New GM will update the Court promptly of any developments in *Felix*, including whether this Court’s assistance will be necessary.

Sixth, a trial date of July 13, 2015 has apparently been set in *Polanco, et al. v. General Motors LLC, et al.*, No. CIVRS1200622 (San Bernardino County, Cal.), a wrongful death action alleging ignition switch defects in a 2006 Chevrolet Cobalt, though New GM has not received notice of the trial setting. New GM has reached out to the *Polanco* plaintiffs to seek agreement to a continuance of the trial date. New GM will update the Court promptly of any developments in *Polanco*, including whether the Court’s assistance will be necessary.

Seventh, on June 8, 2015, Judge Gerber entered the Decision on Motion for 60(b) Relief denying a motion filed by Doris Phillips (MDL No.: 1:14-cv-08540) for relief from a settlement she previously entered into with General Motors Corporation (n/k/a Motors Liquidation Company). Also on June 8, 2015, New GM filed its response to a No Stay Pleading filed by plaintiff in *Pillars v. General Motors LLC*, No. 1:15-cv-11360 (E.D. Mich.). Since the filing of the parties June 5, 2015 joint letter to the Court, four notices of appeal or cross-appeal have been filed with the Bankruptcy Court with respect to Judge Gerber’s June 1, 2015 Judgment in connection with his April 15, 2015 Decision on Motion to Enforce Sale Order. On June 11, 2015, the *Bledsoe* plaintiffs (MDL No. 1:14-cv-07631) filed with the Bankruptcy Court a motion to amend/reconsider the Judgment and an accompanying No Stay Pleading/No Strike Pleading/Objection Pleading. On June 15 and 16, 2015, two parties that previously filed notices of appeal of the Judgment filed with the Bankruptcy Court their statements of issues/designation of record on appeal. On June 16, 2015, the States of California and Arizona (collectively, the

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“States”) each filed a No Strike Pleading with the Bankruptcy Court, and the States filed a joint motion to withdraw the reference with respect to their No Strike Pleadings. On June 18, 2015, the *Elliott* plaintiffs (MDL No. 1:14-cv-08382) filed a petition for leave to appeal the Bankruptcy Court’s Judgment and associated orders to the United States Court of Appeals for the Second Circuit. Also on June 18, 2015, plaintiff in *Gable, et al. v. Walton, et al.*, No. 6737 (Lauderdale County, Tenn.), filed a No Strike Pleading with the Bankruptcy Court. On June 19, 2015, the *Groman* plaintiff (MDL No. 2:14-cv-02458) filed with the Bankruptcy Court a statement of issues/designation of record on appeal. Copies of the foregoing documents are attached hereto as Exhibits 8–23, respectively.

Eighth, pursuant to Order No. 1 § X.8, the Defendants’ July 21, 2014 Status Letter (Doc. No. 73) included an Exhibit A listing cases consolidated to date in MDL 2543, as well as an Exhibit B listing related cases pending in state and federal court, together with their current status. For the Court’s convenience, updated versions of Exhibits A and B are attached hereto as Exhibit 24.

Finally, the parties continue to work to ensure that the Court is provided with current and correct contact information for presiding judges in actions listed in the aforementioned Exhibit B. To that end, the Federal/State Liaison Counsel intends to shortly submit to the Court updates, if any, to the e-mail addresses of the presiding judges in Related Actions.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Robert E. Gerber
Lead Counsel for Plaintiffs
Federal/State Liaison Counsel
Plaintiff Liaison Counsel
Counsel of Record for Defendants